

**FILED**

May 4, 2022

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: WG  
Deputy

**UNITED STATES OF AMERICA**

**Plaintiff**

**v**

**RICARDO MUJICA-CALDERON  
aka RICARDO MUJICA-HERNANDEZ  
aka HERIBERTO SANCHEZ-MEDINA**

**Defendant**

**Cause No: SA:22-CR-00214-JKP(1)**

**INDICTMENT**

**COUNT ONE: 21 U.S.C. §841(a)(1) &  
841(b)(1)(A) Possession with Intent to  
Distribute More Than 500 Grams of a  
Mixture or Substance Containing  
Methamphetamine**

**COUNT TWO: 21 U.S.C. §841(a)(1) &  
841(b)(1)(A) Possession with Intent to  
Distribute More Than 500 Grams of a  
Mixture or Substance Containing  
Methamphetamine**

**COUNT THREE: 18 U.S.C. §922(g)(1) Felon  
in Possession of a Firearm**

**COUNT FOUR: 18 U.S.C. §924(c) Possession  
of a Firearm in Furtherance of a Drug  
Trafficking Crime**

**COUNT FIVE: 18 U.S.C. 111(a)(1)  
Assaulting, Resisting, or Impeding Certain  
Officers or Employees with Physical Contact**

**COUNT SIX: 8 U.S.C. §§ 1326(a) & (b)(1)  
Reentry of Removed Aliens**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]**

That on or about January 25, 2022, in the Western District of Texas, Defendant

**RICARDO MUJICA-CALDERON  
aka RICARDO MUJICA-HERNANDEZ  
aka HERIBERTO SANCHEZ-MEDINA**

did knowingly, intentionally and unlawfully possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT TWO**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]**

That on or about April 13, 2022, in the Western District of Texas, Defendant

**RICARDO MUJICA-CALDERON**  
**aka RICARDO MUJICA-HERNANDEZ**  
**aka HERIBERTO SANCHEZ-MEDINA**

did knowingly, intentionally and unlawfully possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT THREE**  
**[18 U.S.C. § 922(g)(1)]**

That on or about April 13, 2022, in the Western District of Texas, Defendant

**RICARDO MUJICA-CALDERON**  
**aka RICARDO MUJICA-HERNANDEZ**  
**aka HERIBERTO SANCHEZ-MEDINA**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit: a Glock 30S .45 ACP semi-automatic pistol; a Masterpiece Arms .45 ACP semi-automatic pistol; an Anderson Manufacturing AM-15 multi-caliber rifle; and a Glock 21 .45 ACP semi-automatic pistol; and said firearm had been shipped and transported in interstate and foreign commerce in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**  
**[18 U.S.C. § 924(c)]**

That on or about April 13, 2022, in the Western District of Texas, Defendant

**RICARDO MUJICA-CALDERON**  
**aka RICARDO MUJICA-HERNANDEZ**  
**aka HERIBERTO SANCHEZ-MEDINA**

did knowingly possess one or more firearms, to-wit: a Glock 30S .45 ACP semi-automatic pistol; a Masterpiece Arms .45 ACP semi-automatic pistol; two Polymer 80 PF940C 9mm semi-automatic pistols; an Anderson Manufacturing AM-15 multi-caliber rifle; and a Glock 21 .45 ACP semi-automatic pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 United States Code Sections 841(a)(1) & (b)(1)(C), in violation of Title 18, United States Code, Section 924(c).

**COUNT FIVE**  
**[18 U.S.C. § 111(a)(1)]**

On or about April 13, 2022, in the Western District of Texas, Defendant,

**RICARDO MUJICA-CALDERON**  
**aka RICARDO MUJICA-HERNANDEZ**  
**aka HERIBERTO SANCHEZ-MEDINA**

did then and there, forcibly assault, resist, oppose, impede, intimidate, and interfere with an officer and employee of the United States and of any agency in any branch of the United States Government while such person was engaged in and on account of the performance of official duties, and such acts involved physical contact with the victim, in violation of Title 18, United States Code, Section 111(a)(1).

**COUNT SIX**  
**[8 U.S.C. § 1326(a) and (b)(1)]**

That on or about April 13, 2022, in the Western District of Texas, Defendant,

**RICARDO MUJICA-CALDERON  
aka RICARDO MUJICA-HERNANDEZ  
aka HERIBERTO SANCHEZ-MEDINA**

an alien, attempted to enter, entered, and was found in the United States having previously been denied admission, excluded, deported, and removed from the United States on or about November 15, 2019, and that the Defendant had not received consent of the Attorney General of the United States or the Secretary of Homeland Security, to reapply for admission to the United States, in violation of Title 8, United States Code, Sections 1326(a) & (b)(1).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**I.**

**Drug Violations and Forfeiture Statutes**

**[Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), subject to forfeiture pursuant to  
Title 21 U.S.C. §§ 853(a)(1) and (2)]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendant of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. Rule 32.2 and Title 21 U.S.C. §§ 853(a)(1) and (2), which state:

**Title 21 USC § 853. Criminal forfeitures**

**(a) Property subject to criminal forfeitures.**

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

**(1)** any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;

**(2)** any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; ...

**II.**

**Firearms Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 922(g)(1) and 924(c), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violations set forth in Counts Three and Four, the United States of America gives notice to Defendant of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following:

1. \$12,725.00, more or less, in U.S. Currency;
2. Glock 30S, .45 ACP, semi-automatic pistol, bearing serial number YESE494;
3. 2 Polymer 80 PF940C, 9mm semi-automatic pistols, no serial numbers;
4. Masterpiece Arms, .45 ACP, semi-automatic pistol, bearing serial number A12273;
5. Anderson Manufacturing AM-15, multi-caliber rifle, bearing serial number 14117094; and
6. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:



FOR ERIC YUEN  
Assistant United States Attorney